

THE CITY OF NEW YORK OFFICE OF THE MAYOR NEW YORK, NY 10007

September 15, 2017

The Honorable Ajit Pai Chairman Federal Communications Commission 445 12th Street, SW Washington, D.C. 20554-0004

[Filed Electronically]

Re: Pending Petition for Reconsideration – Wireless Emergency Alerts

Dear Chairman Pai:

In September 2016, following the bombing in Manhattan, I wrote to the Federal Communications Commission expressing the importance of the Wireless Emergency Alert (WEA) system to the City of New York and outlined several technical deficiencies that require correction in order to ensure the WEA system can support the emergency communication needs of local government. I applaud the Commission for adopting many of these recommendations and appreciate your personal leadership on this issue. However, I am deeply concerned about the Petition for Reconsideration before the Commission that has the potential to delay or reverse some of the much-needed progress that has been made.

- Inclusion of URLs With WEA messages limited to 90 characters until 2019 and without the ability to embed images, it is absolutely critical that alert originators be able to direct recipients to a website where they can obtain additional information about the alert. I respect CTIA's concern related to website congestion and the City of New York has taken steps to ensure our website remains operational during periods of high volume. CTIA has not, however, provided evidence that congestion will occur on carrier networks and, as such, the Commission should uphold its Order as issued.
- Limiting URLs on Feature Phones and to New Devices Economic inequality is a true and growing concern in New York City. The Commission must not enact a policy that establishes two classes of WEA recipients: those with the means to purchase and operate a smartphone and those who rely on a feature phone. Consumers with feature phones will not be able to click on a website link directly but will be able to enter the URL into another internet-capable device. Further, it is unreasonable for URL support to be limited to new phones and not the tens of millions of devices that are already on the market.
- Support for Spanish-language Alerting There is a clear need for Spanish-language alerting. Though we are still waiting for expanded character counts for Spanish messages, this is not cause to delay implementation of this vital improvement. Depending on the emergency, using the 90 characters available, New York City may issue both English and Spanish messages to the same alert area.

I appreciate the Commission's continued efforts to improve the nation's Wireless Emergency Alert system and implore you to keep progressing forward. The system is already too far behind the times to warrant further delays.

Sincerely,

Bill de Blasio

Mayor